

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Comprehensive Remedial Design/Remedial Action Work Plan for the Test Area North, Operable Unit 1-10, Group 1 Sites (Draft), Field Sampling Plan for Remedial Design/Remedial Action Sampling and Field Screening of Group 1 Sites at Waste Area Group 1, Operable Unit 1-10 (Draft), Operations and Maintenance Plan for Test Area North, Operable Unit 1-10 (Draft), Waste Management Plan for the Test Area North, Operable Unit 1-10 Group 1 Sites Remedial Action (Draft)*

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GENERAL COMMENTS

1	WAG 1 schedule	A brief summary of the proposed grouping of source areas, and the timetable for cleanup of each, would show the logical sequence in the overall cleanup of WAG 1. Although Section 1 groups sources at OU 1-10 into two groups, it does not state that these are indeed Group 1 and Group 2 sources, or what the proposed timetable is for cleanup of each group. Please add this information.	<p>Comment incorporated:</p> <p>The last paragraph on page 1-1 incorporated comment and has been modified as follows:</p> <p>The purpose of the RI/FS was to ... The selected remedies, as identified in the ROD, are specific to each site. Of the eight sites requiring remedial action under the OU 1-10 ROD, four are addressed in this Comprehensive Remedial Design/Remedial Action Work Plan for the Test Area North, Operable Unit 1-10, Group 1 Sites. These sites and the planned remedial action start dates as outlined in the OU 1-10 RD/RA Scope of Work are in Table 1-1.</p> <table><tr><th><u>SITE</u></th><th><u>Start Date</u></th></tr><tr><td>Soil Contamination Area South of the Turntable (TSF-06, Area B)</td><td>May 22, 2001</td></tr><tr><td>Disposal Pond (TSF-07)</td><td>November 14, 2000</td></tr><tr><td>PM-2A Tanks (TSF-26) soil excavation.</td><td>May 22, 2001</td></tr><tr><td>Fuel Leak site (Water Reactor Research Test Facility [WRRTF]-13).</td><td>April 2, 2001</td></tr></table> <p>However, as identified in Section 1.3.1.4 of this RD/RA WP, remedial action at WRRTF-13 will not be required. These schedules in no way preclude starting the remedial action at these sites earlier than planned, nor provide an enforceable schedule to start the remedial action.</p>	<u>SITE</u>	<u>Start Date</u>	Soil Contamination Area South of the Turntable (TSF-06, Area B)	May 22, 2001	Disposal Pond (TSF-07)	November 14, 2000	PM-2A Tanks (TSF-26) soil excavation.	May 22, 2001	Fuel Leak site (Water Reactor Research Test Facility [WRRTF]-13).	April 2, 2001
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1 (con't)				<p>The remaining sites, in addition to the PM-2A Tank content removal, will be addressed in the Comprehensive Remedial Design/Remedial Action Work Plan for the Test Area North, Operable Unit 1-10, Group 2 Sites scheduled to be submitted to the Agencies as a primary Draft June 2001. The Group 2 sites addressed and the planned remedial action start dates as outlined in the OU 1-10 RD/RA Scope of Work are in Table 1-2.</p> <p>For the OU 1-10 Group 2 sites, the schedules may be modified further in the Group 2 sites RD/RAWP.</p> <table><tr><th><u>SITE</u></th><th><u>Start Date</u></th></tr><tr><td>Intermediate-Level (Radioactive) Waste Disposal System (TSF-09)</td><td>October 15, 2002</td></tr><tr><td>Contaminated Tank Southeast of Tank V-3 (TSF-18)</td><td>October 15, 2002</td></tr><tr><td>PM-2A Tanks (TSF-26) tank content Removal.</td><td>August 20, 2002</td></tr><tr><td>TSF Burn Pit (TSF-03)</td><td>March 23, 2004</td></tr><tr><td>WRRTF Burn Pits I, II, III and IV (WRRTF-01)</td><td>March 23, 2004</td></tr></table>	<u>SITE</u>	<u>Start Date</u>	Intermediate-Level (Radioactive) Waste Disposal System (TSF-09)	October 15, 2002	Contaminated Tank Southeast of Tank V-3 (TSF-18)	October 15, 2002	PM-2A Tanks (TSF-26) tank content Removal.	August 20, 2002	TSF Burn Pit (TSF-03)	March 23, 2004	WRRTF Burn Pits I, II, III and IV (WRRTF-01)	March 23, 2004
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2	RBCA Analysis		A Tier II RBCA analysis was done without a prior Tier-0 or Tier-I RBCA analysis. While the RBCA guidance manual for the State of Idaho (Idaho 1996) recommends Tier 0 and Tier-I as preliminary screening, a Tier II should adequately evaluate risks from petroleum contamination for the purpose of this RD/RAWP. However, text should include discussion of the pathways of concern, and the future uses anticipated at this site. This would clarify how this analysis was done, and what the Tier II results mean.	<p>Comment noted: Section 1.2.4 last paragraph, last two sentences were deleted and three new paragraphs with the following text was added:</p> <p>Post-ROD sampling at WRTTF-13 began February 28, 2000 and concluded March 2, 2000. The sample locations and sampling approach are given in the post-ROD field sampling plan (DOE-ID 2000c).</p> <p>Seven borehole locations were selected based on site history to bias the samples toward areas of highest contamination. Borehole 1 was placed at the former location of tank TAN-738, which was known to have leaked, Borehole 2 was placed adjacent to tanks TAN-738 and -739. Boreholes 3 through 6 were placed along transfer piping that was known to have leaked. Finally, Borehole 7 was placed at the former location of tank TAN-787.</p> <p>A Risk Based Corrective Action (RBCA) analysis was performed on the data received from the analytical laboratory. The maximum concentration of each detected contaminant from all the samples collected were compared to the State of Idaho RBCA Tier 0 and Tier 1 screening concentrations. The maximum concentrations from this site exceeded both the Tier 0 and Tier 1 RBCA screening concentrations. To complete the RBCA analysis a Tier 2 evaluation was done using the RBCA Software (State of Idaho RBCA Tier 2 Software Ver 1.0 July 1997). Input data to the RBCA software included: maximum concentrations, current land use is occupational, future land use will be residential, no surficial contaminated soil (which precluded calculating resident child risks due to soil ingestion), and identifying that the groundwater class is 2 since this flow rate is closer to the Snake River Plain Aquifer flow rate. The output for this evaluation is provided in Appendix G. As presented on page G1-1, the cumulative risk at this site for the residential scenario is 1.17E-08 and the cumulative Hazard Index (HI) is 0.96. The cumulative risk for an industrial scenario is 2.65E-09 and the cumulative HI is 0.42. The Subsurface Soil Indoor Inhalation exposure pathway is the main contributor to the cumulative HI. The results of the RBCA Tier 2 analysis are below the Tier 2 evaluation criteria of 1E-05 cumulative risk and a HI of 1.</p>

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3	Excavated Materials		<p>This RD/RAWP does not state whether the contaminated soils will be staged on-site after excavation, or immediately loaded for transport to the receiving facility (ICDF, RWMC, or other). If there is to be any intermediate staging, this RD/RAWP should describe how this staging will occur so that soils at the staging area are unaffected by contaminants in the staged soil. Also, please state whether staging will be the responsibility of the contractor or the subcontractor, and reflect this information in the specifications and the cost analysis.</p> <p>Also, will excavated materials be sampled for contaminants? From the text, it appears that confirmation samples only will be collected from the excavation. The receiving facility may have sampling and analysis requirements prior to receipt of materials for disposal. Please clarify whether excavated materials will be sampled for any analysis prior to disposal. It is assumed that discussions with the proposed receiving facilities are ongoing, and that those facilities' needs for any additional sampling and analysis are known at this time; however, please include this information in the RD/RAWP. Also please state whether such sampling is the responsibility of the contractor or the subcontractor, and, if appropriate, reflect this responsibility in the specifications and cost analysis.</p>	<p>Comment Noted: The soil will be stored until shipment to a disposal facility. The second bullet in section 2.2.2 and section 2.2.4 is modified as follows:</p> <ul style="list-style-type: none"> • "Excavation of contaminated soil exceeding the 23.3 pCi/g Cs-137 FRG, and storage of the waste in a CERCLA Storage Area until shipment to the disposal facility" <p>Setting up the CSA will be the responsibility of the BBWI contractor. Based on the current planning, the excavation and disposal of the contaminated soil at TSF-26 and TSF-06 will be done by the BBWI contractor. A subcontractor will be used to replace the road.</p> <p>Comment Noted:</p> <p>The excavated soil may be sampled either as in-situ or ex-situ to obtain a No-longer Contained-in determination if needed from the State of Idaho IDEQ. Currently the waste profiles have been given to the RWMC and ICDF and both of them are able to take the waste that will be generated from these sites.</p> <p>The sampling will be conducted by the contractor (BBWI), and since the excavation and the sampling will be performed by the BBWI contractor the specifications do not need to be modified.</p> <p>The cost estimate has been modified to be consistent with the most current INEEL Detailed Work Plan</p>

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4	Appendix D		<p>A. The air emissions modeling is based on emission calculations using outdated equations from AP-42. Emission factors calculated using the most current version of AP-42 (Section 13.2.2, dated 9/98) results in significantly higher emission factor values. These higher emission factor values would be expected to result in higher predicted ambient concentrations and higher body burdens and risks predicted by the CAP-88 model. The entire analysis should be redone using the most recent version of AP-42.</p> <p>B. Using the equations and parameter values presented in Attachment D1, it was not possible to recreate the emission factors for unpaved roads or for pickup and dropping. If re-analysis is performed (as suggested in the previous comment), these values would be expected to change. However, sufficient information should be submitted so that these emission factors can be recreated, whether the analysis is redone or not.</p> <p>C. The air emissions model assumptions include a dust suppression rate of 95% based on a water application rate of 0.5 l/m². Part 3, Section 3.3 of Appendix B, however, makes no such requirement on the contractor, and appears to suggest that the use of water spray is at the discretion of the contractor, providing that he "minimizes the creation and emission of dust." Section 3.3 of Appendix B should be revised to ensure that dust suppression at the required rate of removal will be achieved by the contractor. The section also mentions to the contractor's use of "visual observation," but Section 5.2.8 of the main body of the document indicates that a radiation control engineer and CIH will specify air monitoring requirements, including perhaps wind monitoring. Appendix B should be revised to eliminate this ambiguity.</p> <p>D. Input parameters for CAP-88 were not provided, and therefore the calculations could not be checked. If a re-analysis is submitted, the CAP-88 input parameters should be provided to allow for independent verification of the predicted concentrations, body burden, and associated risks.</p>	<p>Comment Incorporated:</p> <p>The most recent AP-42 equation will be used. The modeling will also include air emissions from the PM-2A surficial soils removal.</p> <p>Comment Noted:</p> <p>This information has been included to facilitate recreating emission factors.</p> <p>Comment Noted:</p> <p>Dust suppression was not included in the CAP88-PC re-run to demonstrate the worst case scenario. Even without dust suppression the exposure is below acceptable levels. However, due to INEEL procedures, dust suppression will be implemented to control fugitive dust.</p> <p>Comment Incorporated:</p> <p>Input parameters for CAP88-PC have been included in Appendix D</p>

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Specific Comments				
1	1.2.2	P. 1-7	This section describes the Disposal Pond (TSF-07). The description states that the Disposal Pond is 35 acres in size. Further descriptions state the following sub-areas within TSF-07: 30 acres that never received wastewater, 2.5 acres that are still in use, and 5 acres in the northeast corner on the eastern edge of the pond which is contaminated. This totals to 37.5 acres, not 35 acres. Please explain the difference between the total area, and the sum of the sub-areas (possibly a typo?).	<p>Comment Noted:</p> <p>This section has been modified as follows:</p> <p>The Disposal Pond is a 14-ha (35-acre), unlined disposal pond in the southwest portion of TSF. The Disposal Pond is surrounded by a 1.5-m (5-ft) tall berm. Based on available field screening data, 12-ha (30-acre) of Disposal Pond have never received wastewater and is not contaminated.</p> <p>The remaining 2-ha (5-acre) in the northeast corner and on the eastern edge of the pond has been contaminated with Cs-137 and metals. However, it was assumed in the RI/FS that the area of contamination covers the entire main pond and overflow pond surfaces. Previous sampling activities indicate that the Cs-137 has migrated to approximately 3-m (11-ft) below the bottom of the pond in this area. Historically, the pond received sanitary waste discharges, low-level radioactive waste, industrial wastewater, and treated sewage effluent.</p> <p>The Disposal Pond replaced the TSF-05 Injection Well, and began receiving wastewater in September, 1972. The pond received wastewater from a variety of sources that included sanitary waste discharges, low-level radioactive waste, cold process water, and treated sewage effluent that originated from TAN service buildings and processes.</p> <p>Current discharges to a 1-ha (2.5 acres) portion of the Disposal Pond are permitted by the State of Idaho to receive sanitary and industrial waste (DOE-ID1997a). In addition a section of the pond was portioned in 1992-1993 for discharge of treated effluent from the TSF-05 Injection Well Contaminated Groundwater OU 1-074 Interim Action (DOE-ID 1997b). This active portion of the pond will undergo assessments when operation cease.</p> <p>The last paragraph of section 1.2.2 remains unchanged.</p>

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2	1.2.3	P. 1-8	This section describes the PM-2A Tanks Site Soil Contamination Area (TSF-26). Text at the bottom of the page states that remaining remedial actions at this site will be performed under a subsequent work plan. For completeness, the text should state what remedial actions remain at this site after cleanup of the PM-2A Tanks Site Soil Contamination Area.	<p>Comment Incorporated:</p> <p>In the fifth paragraph of this section, the text has been modified as follows:</p> <p>The PM-2A Tank remedial action that will occur under this work plan will be placement of clean fill material over the entire area to mitigate further contaminant migration until remedial action at this site can occur, and excavation and disposal of soils greater than the FRG of 23.3 pCi/g Cs-137, to a maximum depth of 3 m (10 ft). The remaining remedial action at this site will include removal and disposal of the tank contents, decontamination of the tanks, filling the tanks with inert material, and backfilling the PM-2A area to surrounding contours. This remaining work will be performed under the Group 2 RD/RAWP. Waste management for this site will depend upon a no-longer contained-in determination, which will be prepared and submitted to IDEQ.</p>
3	1.3.1.4	P. 1-10	Recommend that the text be revised to reflect the current understanding of the site, specifically in regards to the risk posed and action required.	<p>Comment Incorporated:</p> <p>This section has been modified as follows:</p> <p>Fuel Leak Site (WRRTF-13). The selected remedy for the Fuel Leak site is Excavation and Land Farming of contaminated soil exceeding the FRG. Post-ROD sampling was conducted at this site as discussed in Section 1.2.4 of this RD/RAWP. Based on the sample results and the current and future land use assumptions for this site, the RBCA Tier 2 evaluation as presented in Appendix G, requires no remedial action activities. Therefore, remedial action at the WRRTF-13 site will not be discussed any further in this document.</p>
4	2.2.2 and 2.2.4	P. 2-2 and 2-3	These two sections describe design criteria for TSF-06, Area B, and for the PM-2A Tanks. Soil at TSF-06, Area B will be excavated to remove contaminated soils exceeding 2.3 picocuries per gram (pCi/gm), while soils at PM-2A will be excavated to remove contaminated soil exceeding 23.3 pCi/gm. In both cases, removal of surface soil is involved, and the contaminant of concern in both cases is cesium-137. Please explain the difference in the targeted concentrations in cesium-137.	<p>Comment noted:</p> <p>Please refer to EPA General Comment #3 resolution.</p>

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5	2.2.2	P. 2-2	Last bullet. This bullet should be removed since the clean up level has been changed.	Comment noted: Please refer to IDEQ Specific Comment #7 for the RD/RAWP.
6	2.7.4	P. 2-6	Update this section to reflect the new knowledge of the site.	Comment noted: This section has been deleted per the new text in Section 1.3.1.4 which states that there is no need for remedial action based on post-ROD sample analytical results.
7	2.9.1	P. 2-6	This section summarizes post-ROD sampling at TSF-06, which was contaminated through windblown deposition of contaminated soils from the PM-2A tanks area. Text in this section states that waste material from this location (including sampling wastes and PPE) are suspected to contain trichloroethene, 1,1,1-trichloroethane, carbon tetrachloride, and acetone. Please explain the reason why these contaminants are suspected; would it be from the PPE and sampling wastes?	Comment Noted: This site has been identified as being contaminated by windblown from the PM-2A site. Through process knowledge, the PM-2A site has received these constituents. Even though these are VOCs and are unlikely to be in the soil at TSF-06, the State of Idaho IDEQ would not allow that these be removed. These constituents carry a RCRA waste codes of F001 and the soil in this area is considered to be RCRA listed until a no-longer contained-in determination is granted by IDEQ. It also needs to be noted that this section has been modified to reflex the work that has already been conducted at this site. Modifications to Section 2.9.1 and 2.9.2 are as follows: 2.9.1 Soil Contamination Area South of the Turntable (TSF-06, Area B) During post-ROD sampling activities it was identified through investigations with TAN Operations personnel and research into the history of the site, that the remaining contamination in the 152 m (500 ft) by 15 m (50 ft) area (not including the road), had 0.3 m (1 ft) to 0.6 m (2 ft) feet of clean fill material placed in this area by TAN Operations Radiation Control to shield from radioactive material. This overburden material was rad surveyed using the procedure as identified in the post-ROD field sampling plan (DOE-ID 2000c) and contaminated material with concentrations greater than the FRG of 23.3 pCi/g Cs-137 was removed, placed into soil bags, and is being stored in the Radioactive Part s Security Storage Area RPSSA at TAN as a potentially mixed and PCB waste until



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7 (cont)				<p>shipment to a disposal facility on or off the INEEL occurs. The potential presence of PCBs will be managed according to 40 CFR 761.50 (b)(7)(ii).</p> <p>The contamination in the overburden came from windblown contamination from the PM-2A soil stockpiles. Once a NLCI determination is obtained for the stockpiles a NLCI determination for the overburden material will be generated based on the soil stockpile data and will be disposed of as low-level waste only. A total of approximately 270 m³ (350 yd³) of contaminated material was removed and the remaining overburden material that was below the FRG for Cs-137 was scraped to the side to facilitate post-ROD rad surveying of the native soil. The rad survey of the native soil will identify areas where the soil concentration exceeds the FRG of 23.3 pCi/g Cs-137.</p> <p>2.9.2 PM-2A Tanks Site Soil Contamination Area (TSF-26)</p> <p>Post-ROD sampling activities at the PM-2A Tanks will include sampling and analysis for: (1) three soil stockpiles, (2) wooden box, and (3) Cs-137 contamination delineation. Waste material generated at the PM-2A Tanks, including personal protective equipment PPE and sampling wastes, will be managed as potentially RCRA-listed (F001) waste, due to the suspected presence of trichloroethene, 1,1,1-trichloroethane, and carbon tetrachloride. The potential presence of PCBs will be managed according to 40 CFR 761.50(b)(7)(ii), taking into account the results of post-ROD PCB sampling at the site.</p> <p>The following subsections further describe each of the three sampling activities at the PM-2A Tanks.</p> <p>2.9.2.1 Soil Stockpiles. Three soil stockpiles remain at the PM-2A Tanks after the 1996 OU 10-06 removal action. Sampling data will be used to support a no-further contained-in determination for the stockpiles. The stockpiled soils will be sampled for contaminants known to have been present in the PM-2A Tanks. Analyses will include Universal Treatment Standard metals, toxicity characteristic leaching procedure metals, Contract Laboratory Program (CLP) VOCs, CLP SVOCs, PCBs, and gamma spectroscopy.</p> <p>Once the samples were collected from the stockpiles, they were excavated and placed into soil bags and are being stored in the RPSSA at TAN until shipment to</p>



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7 (con t)				<p>a disposal facility occurs. A total of 107 m³ (140 yd³) of contaminated waste was generated.</p> <p>2.9.2.2 Wooden Box. The top of what appeared to be a wooden box was discovered at the PM-2A Tanks during the 1996 OU 10-06 removal action. It was not sampled nor removed during the OU 10-06 removal action because the contents of the box were unknown. Samples will be collected from inside the wooden box and analyzed for Universal Treatment Standard (UTS) metals, toxicity characteristic leaching procedure TCLP metals, CLP VOCs, CLP SVOCs, PCBs, and gamma spectroscopy. Data obtained will be used to complete the OU 1-10 RD/RA work plan and to determine the appropriate disposition for the contents of the wooden box.</p> <p>Once the samples were collected from the wooden box, it was excavated with additional soil surrounding the wooden box and placed into soil bags and are being stored in the RPSSA at TAN until shipment to a disposal facility occurs. A total of 8 m³ (10 yd³) of contaminated waste was generated.</p> <p>2.9.2.3 Cs-137 Contamination Delineation. The boundaries of Cs-137 contaminated soil at the PM-2A Tanks will be located and delineated using a three-step sampling approach to identify areas with Cs-137 concentrations greater than the FRG of 23.3 pCi/g. Biased samples (determined from the results of the first two field screening sampling steps) will be taken and submitted for a 20-minute gamma spectrometric analysis to identify areas requiring excavation. Once the areas requiring excavation are identified, additional samples will be collected to obtain data for a no-longer contained-in determination. Both the radiological sampling and no-longer contained-in sampling are described in the post-ROD Field Sampling Plan (DOE-ID 2006d). The data gathered during the post-ROD sampling activities will be used to support waste disposal and identify where Cs-137 soil concentrations exceed the FRG of 23.2 pCi/g.</p>
8	2.9.1	P. 2-7	First full sentence on the page. Update the citation to 761.50(b)(7)(ii).	The citation is for management of PCBs and after further evaluation it is correct.



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9	3.4.3	P. 3-2	Delete the first sentence of the section.	Comment noted: This section has been deleted. See comment resolution to EPA Specific Comment item number 6.
10	Table 4-2	P. 4-4	First RCRA citation. Please explain the compliance strategy and how WDDF meets the citation.	Comment Noted: The INEEL Waste Determination and Disposal Form (WDDF) is a form that is used at the INEEL to walk the generator through the requirements of 40 CFA 262.11.
11	5.1.1	P. 5-1	Note that there are changes, e.g. the change in cleanup level at TSF-06, and the no risk determination at WRRTF-13.	Comment Noted: The change to the clean up level at TSF-06 has been changed back to 23.3 pCi/g Cs-137 per the FRG as identified in the OU 1-10 ROD. However, this section has been modified as follows: "Based on Post-ROD sampling at WRRTF-13, and a Tier 2 State of Idaho RBCA evaluation (see Appendix F), no remedial action is required at WRRTF-13 as identified in Sections 1.2.4 and 1.3.1.4. The construction completion report as discussed in the scope of work has been renamed the final inspection report to be more consistent with the FFA/CO and RD/RA guidance terminology."

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DATE: June 21, 2000

REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
12	5.3	P. 5-8 to 5-11	This section, which lists supporting documents, does not include the Field Sampling Plan, which was received for review. Also, Section 5.3.4 describes a Waste Minimization Plan (not received), although a Waste Management Plan was received. Please clarify whether the Waste Minimization Plan and the Waste Management Plan are the same document.	<p>Comment Noted:</p> <p>A new section was added as section 5.3.5 Confirmation Field Sampling Plan. The following sections were renumbered. The new section is as follows:</p> <p>5.3.5 Remedial Action Field Sampling Plan</p> <p>The remedial action field sampling plan has been prepared for the specific tasks of conducting confirmation sampling at TSF-26 and TSF-06. This document is a living document and may be updated as conditions dictate. This plan covers the following items:</p> <ul style="list-style-type: none"> • Task-site responsibility • Personnel training • Sampling objectives • Sampling locations and frequency • Sampling procedures • Sampling equipment. <p>The Waste Minimization Plan in Section 5.3.4 will be revised to the Waste Management Plan.</p>
13	5.3.3	P. 5-9	First bullet. Please explain why isopropanol will not be used during decon.	<p>Comment Noted:</p> <p>To eliminate the generation of RCRA Waste, Isopropanol will not be used.</p>
Appendix B, Specifications				
14	1.2	P. 02200-2	This section identifies reference documents, and states that the American Society for Testing Materials is a reference, without specifying a specific ASTM method. ASTM D-698 is the only ASTM method specified in all of Section 02200. Section 1.2 should specify ASTM D-698, and any other ASTM methods to be used as part of Earthwork, which is described in this section.	<p>Comment Noted:</p> <p>The ASTM reference has been deleted. Requirements for compaction of top soil in Section 3.4.3 (b) was modified as follows:</p> <p>Topsoil shall be compacted with a minimum of three passes of a sheepsfoot roller.</p>

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
15	3.4.3 (b)	P. 02200	Section 3.4.3 describes fill material, including topsoil; subsection (b) describes compaction. ASTM D-698 is the method specified to ensure that compaction to a minimum of 95 percent of maximum dry density is achieved. Topsoil (per Section 2.1.4) is only required to be free of rubble, litter, insect manifestation, and other deleterious matter, and be free of rocks larger than 3 inches in diameter. ASTM D-698 applies only to soils retaining less than 30 percent by weight on a 3/4" sieve (ASTM 2000). Thus, if more than 30 percent by weight of the topsoil is between 3/4" and 3", then ASTM D-698 will not apply. Either the topsoil specifications should include a size requirement consistent with ASTM D-698, or a different ASTM method should be specified.	Comment Noted: The reviewer is correct with the ASTM method evaluation. For the topsoil placement at these sites, there is no requirement to perform ASTM compaction testing. Section 3.4.3 (b) has been modified as follows: Topsoil shall be compacted with a minimum of three passes of a sheepsfoot roller.
16	1.2	P. 02222	This section lists ASTM D-1556, and ASTM D-2922 as references for this section. However, ASTM D-1556 is not used in this section; suggest that it be removed if it will not be used.	Comment Noted: The ASTM reference has been deleted, there are no requirements for compaction at this site
17	2.1.1	P. 02222-2	This section states that "Backfill material may be the materials from trench excavation or gravel as specified under Specification 02200, Earthwork." No trenching has been identified for this project; please explain where this trench excavation material originates. Gravel is also not clearly specified in Specification 02200, Section 2.1; suggest that Section 02200 should specify the size of gravel for fill material.	Comment Noted: The text in this section has been modified as follows: Backfill material may be any type of clean fill material that is accessible at TAN.
18	3.2	P. 02930-5	Maintenance. There is no description on how success of the revegetation is determine. Some text describing the % of coverage or percent of germination should be included.	Comment Noted: As identified in the OU 1-10 ROD vegetation of the TSF-06 and TSF-26 are not part of the remedy and is not required by the ROD. However, the vegetation coverage will be monitored by INEEL personnel per BBWI procedures. For soil disturbance outside facility boundaries, and environmental checklist would require a biological assessment. A biological assessment would require revegetation if applicable.

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
Appendix D, Emission Calculations				
19	Table D2	P. D-2	It appears that line 3 of this table should match line 2 of Table D1-3 in the same way that line 4 of Table D-2 matches line 4 of Table D1-3, but in fact, the values are significantly lower, resulting in a much lower estimate of the radionuclide release. Please explain this discrepancy.	Comment Noted: The CAP-88 model will be re-ran and this comment is resolved
20	Attachment D1	P. D1-2	Calculations of Particulate Emissions from Unpaved Roads. The stated equation for calculation of emission factors, although outdated, is not conservative enough. The last factor in the equation should have been set to 1.0 by assuming a value of $p = 1$. Earlier editions of AP-42 indicated that worst case emissions were estimated by setting $p = 1$ (assumes no rain events). The approach taken is only about 83% of the worst case analysis.	Comment Incorporated: The most current AP-42 equation will be used and dust suppression will not be used in the model re-run.

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION															
21	Attachment D1	P. D1-2	<p>Calculations of Particulate Emissions from Unpaved Roads. The equation used for estimating the emissions from the unpaved roads should be revised in accordance with the latest version of AP-42, Section 13.2.2, 9/98.</p> <p>The appropriate new equation is as follows:</p> $E = k \frac{(s/12)^a (W/3)^b}{(M/0.2)^c}$ <p>The following table illustrates the differences between emission factors, as calculated using the old equation (Current Value) and those calculated using the new equation (Proposed Revised Value). (Note that the revised AP-42 now presents constants only for aerodynamic diameters of 2.5, 10 and 30 micrometers.)</p> <table><tr><th colspan="3">Emission Factors</th></tr><tr><th>PM Diameter, μm</th><th>Current Value</th><th>Proposed Revised Value</th></tr><tr><td>2.5</td><td>0.20</td><td>0.13</td></tr><tr><td>10</td><td>0.77</td><td>0.90</td></tr><tr><td>30</td><td>1.70</td><td>2.96</td></tr></table> <p>Significant differences in estimated dose and risk calculated with CAP-88 Model can be anticipated if these proposed revised values are used in the subsequent analysis. Using the PM-30 revised value, for example, and assuming a 5 mi/hr travel rate, which appears to have been used in Table D1-3, total road particulate emissions (road plus pickup/drop emissions) would be 5,909.7 lbs as compared to 2,966.3 lbs. (2,770.2 plus 196.1 lbs.) summarized in Table D-2. Radionuclide emissions would also be considerably higher, 4.02 E-04, compared to 2.02 E-04 in Table D-2.</p>	Emission Factors			PM Diameter, μm	Current Value	Proposed Revised Value	2.5	0.20	0.13	10	0.77	0.90	30	1.70	2.96	<p>Comment Incorporated:</p> <p>The most current AP-42 equation will be used in the model re-run.</p>
Emission Factors																			
PM Diameter, μm	Current Value	Proposed Revised Value																	
2.5	0.20	0.13																	
10	0.77	0.90																	
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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
22	Attachment D1	Table D1-3	Unpaved Road and Pickup and Dropping Emission Factors and Emission Rates for Different Sizes of Particulate Matter. Particulate emission rates for the unpaved roads could not be reproduced using the information provided. If additional assumptions were used to calculate these emission rates, they should be provided.	Comment Incorporated: These assumptions have been included in Appendix D
23	Attachment D1	Table D1-3	Unpaved Road and Pickup and Dropping Emission Factors and Emission Rates for Different Sizes of Particulate Matter. Particulate emission rates for the pickup and dropping could not be reproduced using the information provided. If additional assumptions were used to develop these emission rates, they should be provided.	Comment Incorporated: These assumptions have been included in Appendix D

Appendix E, Cost Estimates

24	Appendix E, Section 3	P. E-3	Text describing cost assumptions for both TSF-06 and TSF-26 states that "cost considerations were given to maintaining electrical service in this area during remediation activities." Please clarify what this statement means. Specification 02222, Section 3.2.1 (Appendix B) states only that any excavation within a minimum distance of any existing high voltage or high hazard electrical utility will require Lockout/Tagout or proper preparation, with a minimum 4-day notice required. Please ensure that specifications include any important requirements stated in Appendix E.	<p>Comment Incorporated:</p> <p>The assumption language will be revised based on more current planning information. For TSF-06 the language will be revised to:</p> <p>"Costs have been included for removing and replacing a power pole along Snake Avenue within the contaminated soil area"</p> <p>For TSF-26 the bullet will be removed since the remedial action work will not affect TAN electrical service.</p> <p>A specification addressing the removal and replacement of the power pole at TSF-06 is not provided with the RD/RA WP because specification requirements are specified by the INEEL power management who will be performing the work</p>
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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
25	Appendix E, Section 3	P. E-4	The section describing cost assumptions for the fuel leak source states that pre-excavation samples will be collected for RBCA analysis. It is assumed that these pre-excavation samples have already been collected, as evidenced by Appendix G of this RD/RAWP, but it is stated as a future item. Please state in this section whether this sampling and RBCA analysis has already occurred.	Comment Incorporated: Sampling and RBCA analysis is complete. The first bullet under WRRTF-13 will be revised to past tense as follows: Pre-excavation sampling was conducted at the site to determine the concentrations of gasoline and diesel constituents present. Analytical results were used in accordance with the State of Idaho RBCA and IDEQ guidance to determine the site classification and appropriate clean up levels.

Appendix G, RBCA

26	Appendix G	P. G1-1	This page summarizes the risk and hazard indices calculated using the RBCA analysis. However, the columns for the resident child risk and hazard index are blank. Please explain this omission.	Comment noted: please refer to resolution for EPA General Comment #2.
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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
Field Sampling Plan				
27	1.1	P. 1-1	Cs-137 is a contaminant "marker" for remediation. Considering that additional contaminants are present and their soil mobility relative to Cs-137 are usually quite different, it is not apparent that Cs-137 will adequately track the potential range of likely contaminant concentrations. Please explain why only Cs-137 is used. Also, why is the excavation depth limited to 3 feet? Is this based on external exposure concerns only? What if 50 pCi/g Cs-137 were measured at 3 feet? What action would be taken?	<p>Comment Noted:</p> <p>Per the OU 1-10 ROD the only COC at this site is Cs-137. If the Cs-137 concentrations are below the 23.3 pCi/g FRG then the soil will not be excavated. The depth of excavation at TSF-06 will be limited to 10-ft bls and the depth at TSF-26 will be limited to 10-ft below surrounding land surface and then under the OU 1-10 Group 2 sites remedial action the tank contents will be removed. In addition, a clean soil layer will be placed over the PM-2A site prior to the start of the Group 1 remedial action to prevent windblown migration to the TSF-06 site.</p>
28	2.2.1	P. 2-6	It is stated that the excavated area was analyzed for gamma-emitting radionuclides. This analytical approach is rather limiting. Has any alpha isotopic measurements been performed for TRU nuclides? The text does not clearly state whether that a complete characterization of the probable contaminants is available. It is stated that the primary COC for the soil contamination is Cs-137, and this is based on residential screening results. One should define the nature of the residential screening (i.e., define all pathways considered). A residential screening scenario can be rather restrictive depending on available pathways.	<p>Comment Noted:</p> <p>Based on the OU 1-10 Final ROD the only COC at this site is Cs-137. The information that the reviewer is asking for is in the OU 1-10 RI/FS and this section summarizes what the RI and ROD have stated.</p>

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
29	4.2	P. 4-1	Soil sample collection will be biased toward areas where the radiation survey indicates the highest counts above background. It is important to define the conditions that satisfy the "above background" condition. This is not adequately defined; the survey is a key tool in the remediation effort and reliability is required.	Comment Noted: This sampling will be conducted for confirmation, background counts vary due to shine from TAN-607 and other buildings around these two sites. Therefore, a RCT will walk over the entire area and places that the NaI detector begins to have higher counts he will flag that spot where he is getting the highest counts. These flagged spots will then be sampled and the samples will be sent to an on-site laboratory for a 20-minute gamma spectroscopy shipping screen. Based on the results either additional soil will need to be removed or the site will be backfilled.
30	6.1.1	P. 6-1	The operation and use of the portable gamma scintillometer is not adequately described. Is this tool a gross gamma survey instrument, or is it a portable gamma ray spectrometer? Is the sensitivity of the survey consistent with detection of 15 pCi/g Cs-137 levels? Is the chosen methodology consistent with MARSSIM (NUREG-1575) requirements? Please clarify.	Comment Noted: The gamma scintillometer is a gross gamma survey instrument and the sensitivity of the survey will not give concentrations of Cs-137 which is why soil samples will be collected. However, the sensitivity of the instrument will identify areas where the counts are higher than the surrounding. The MARSSIM (NUREG-1575) portion of the comment was withdrawn by EPA during the July 11 th conference call.
31	6.1.2	P. 6-2	A Field Sampling Plan should specify sample container volumes. The referenced document does not ensure that special conditions have been considered for this FSP. For example, additional samples may be required for a certain gamma spectroscopy geometry.	The INEEL Quality Assurance Project Plan (QAPjP) specifies container volumes. No text was modified.

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32	6.2.2 Last Paragraph	P. 6-5	While WERF is still accepting waste, it is this reviewers understanding that this facility will soon be shut down. Does an alternative facility exist that can receive such waste as this?	<p>Comment Noted:</p> <p>The last paragraph has been modified as follows:</p> <p>This waste will be incinerated at the INEEL Waste Experimental Reduction Facility (WERF) or other on-site/off-site approved facility. Each cardboard box is limited to a weight of 27 kg (60 lb) or less and a maximum radiation reading of 20 mrem/hr on contact. The taped boxes will be shrink-wrapped to a pallet for shipment and incinerated. The contents, weight, and radiation reading on each ...</p>
Operations And Maintenance Plan				
33	3.1	P. 3-1	The text states that IC's will not be required if the contaminated media at a site is removed to the top of basalt. Since IC's are required as long as contamination remains on site that restricts land use, it is not clear how removing contaminated media yet leaving contamination on basalt at a site removes the need for IC's.	<p>Comment Incorporated:</p> <p>The fifth sentence has been revised to, "Institutional controls will not be required if contamination concentrations are comparable to local background values, or if residual concentrations are less than or equal to a 1E-04 risk-based soil concentration for a hypothetical current or future residential scenario, or current or future industrial scenario (DOE-ID 1999)."</p>
34	3.4.3, 2 nd Paragraph	P. 3-2	Update this section to reflect current thinking, i.e. no risk, no action, no IC's.	<p>Comment Noted:</p> <p>The ICs will be identified in the WAG 1 Institutional Control Plan and will be covered in that plan. A reference will be added in the text (DOE-ID 2000) to refer to the IC plan.</p>

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35	5.2	P. 5-1	This section states that no routine maintenance is planned for these sites. How does one plan to address the need to insure that signs and/or fences remain in place over time?	<p>Comment Noted:</p> <p>All fences and signs that are a component of the remedy (i.e. they are institutional controls) will be addressed in the WAG 1 institutional control plan. No text was modified. Please also see resolution to DOE Comment #6 for reorganization of this section.</p>
Waste Management Plan				
36	3.1.4 Last Paragraph	P. 3-4	EPA recommends moving this paragraph to beginning of the section.	<p>Comment Noted:</p> <p>This section has been modified such that the only text in this section is the last paragraph</p>
37	4.3.1.2 and Table 3.1	P. 4-2	Apparently a typo in the text. The volume of solid, low-level, or mixed waste in the text and table does not agree.	<p>Comment Noted:</p> <p>The text has been changed to 14,160.2 m³ (18,520.4 yd³).</p>